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Counsel for Defendants Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, Kimberly Yvette Smith, M.D., a/k/a Kimberly Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Rhaul Shah, M.D., John Catalano, M.D., Richard C. DiVerniero, M.D., and Richard Strauss, M.D.

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

ALL CASES

MDL No. 2419
Docket No. 1:13-md-2419 (RWZ)

NOTICE OF FILING OF NOTICES OF DEPOSITION BY WRITTEN QUESTIONS

Pursuant to Fed. R. Civ. P. 31, Premier Orthopedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopedic Associates, Premier Orthopedic Associates Surgical Center, LLC, Kimberly Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Rahul Shah, M.D., Richard C. DiVerniero, M.D. (Hereinafter “The Premier Defendants” or “Premier”) give notice to the Court and to all parties of the filing of the following:

1. Notice of Deposition by Written Questions to Central Jersey Orthopedics Specialists, PC¹
2. Notice of Deposition by Written Questions to Montclair Orthopedic Group²

¹ Exhibit 1.

3. Notice of Deposition by Written Questions to New Jersey Spine & Sports Medicine³
4. Notice of Deposition by Written Questions to Ross Center for Orthopedics⁴
5. Notice of Deposition by Written Questions to Vanderbilt Medical Group Clinic Pharmacy⁵
6. Notice of Deposition by Written Questions to Summit Surgery Center⁶
7. Notice of Deposition by Written Questions to The Emory Clinic Ambulatory Surgery Center⁷
8. Notice of Deposition by Written Questions to University of Tennessee Medical Center⁸

Respectfully submitted,

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/s/ Christopher M. Wolk
Christopher M. Wolk, Esq.

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² Exhibit 2.
³ Exhibit 3.
⁴ Exhibit 4.
⁵ Exhibit 6.
⁶ Exhibit 7.
⁷ Exhibit 9.
⁸ Exhibit 10.

CERTIFICATION

I certify that in submitting this *NOTICE OF FILING*, I caused a copy of the above to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's System, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: February 11, 2016

/s/ Christopher M. Wolk
Christopher M. Wolk, Esq.